



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

FEB 27 2015

GENERAL NOTICE LETTER -- URGENT LEGAL MATTER

PROMPT REPLY NECESSARY, CERTIFIED MAIL: #7014 0150 0000 2452 7862

RETURN RECEIPT REQUESTED

The Lubrizol Corporation
29400 Lakeland Blvd
Wickliffe, Ohio 44092

RE: General Notice Letter for the CES Environmental Services, Inc.- Houston Superfund Site in Houston, Harris County, Texas

Dear Sir/Madam:

The purpose of this letter is to notify you of your potential liability at the CES Environmental Services, Inc.- Houston Superfund Site (Site) and to invite you to join in settlement negotiations with the U.S. Environmental Protection Agency (EPA). The street address for the Site is 4904 Griggs Road, Houston, Harris County, Texas. The street addresses of the contiguous properties that are parts of the Site are 4900 Griggs Road and 5910 Wayland Street. The Site is surrounded by residential, educational and commercial properties. Based on available information, the EPA has determined that you may be responsible under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, for cleanup of the Site or costs the EPA has incurred in cleaning up the Site.

Explanation of Potential Liability

A Superfund Site is a place that is contaminated with hazardous substances at levels that may present a threat to human health or the environment. Under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, potentially responsible parties (PRPs) may be required to perform cleanup actions to protect the public health and welfare or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site. PRPs include current and former owners and operators of the Site, as well as persons who sent or transported hazardous substances to the Site for disposal or treatment or who arranged for the disposal or treatment of hazardous substances at the Site.

Under CERCLA, specifically Sections 106(a) and 107(a), PRPs may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site, unless the PRP can show divisibility of harm or any of the statutory defenses. PRPs include current and former owners and operators of a site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

You have been identified as a PRP who either sent hazardous substances for disposal or treatment to the Site or generated certain hazardous substances that the EPA has found at the Site. For this reason the attached General Notice concerning the removal action (Enclosure 1) is being sent to you. The General Notice requests your cooperation in conducting the on-going removal action at the Site and for reimbursement of past and future costs. Enclosure 2 contains copies of the documents used to identify you as a PRP. Enclosure 3 contains a list of the entities who are receiving this General Notice.

Site Background

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. Prior to the bankruptcy, the Site had been owned and operated by CES Environmental Services, Inc. The Site is now under the control of a Trustee for the Estate appointed by the Bankruptcy Court. The Estate does not have the funding necessary to address the conditions at the Site. The Site consists of approximately eleven vacuum boxes, two roll-off boxes, twelve frac tanks, two tanker trailers, 20 aboveground storage tanks, 15 waste water treatment tanks, waste piles, and numerous totes, vats, drums, and smaller containers. Additionally, there was spillage of chemicals to exterior surfaces as well as building interiors. The Site has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills have occurred due to vandalism which has resulted in the spillage of chemicals and waste to the ground surface and into an adjacent residential neighborhood. Removal is time critical per the Action Memo.

The information provided by the Estate's consultant shows that there are hazardous wastes along with various hazardous substances within containers located on the Site. The hazardous substances include but are not limited to benzene (D018), creosol (D023-026), 2,4,6-trichlorophenol (D042), pH (D002), ignitability (D001), MEK (D035), and 1,2-dichloroethane (D028). These chemicals are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14), and further defined at 40 C.F.R. 302.4.

Response Actions to Date

On or about September 3, 2014, the EPA mobilized its contractors to begin addressing the wastes and spills at the Site. The EPA's Time Critical Removal Action has addressed the following:

1. Management of stormwater to reduce off-site overflow of contaminated stormwater from the Site.
2. Removal of wastes from ten of twelve vacuum boxes and from two of two roll-off boxes.
3. Removal of wastes from eight of twelve frac tanks. Three frac tanks currently hold wastes.
4. Removal of liquid, i.e., pump able, wastes from eleven of twenty-three aboveground storage tanks (AST). Sludge and residual materials remain until sludge removal and tank cleaning of ASTs is completed.
5. Empty totes/drums have been segregated for temporary storage.
6. Waste piles dumped to the ground from the theft of seven roll-off boxes was removed by the Trustee.
7. Lab chemicals/company process samples were collected and disposed by the Trustee.
8. Process chemicals were collected and disposed by the Trustee.

Upon reviewing the enclosed General Notice, please provide a written response to Mr. Robert Werner, Enforcement Officer at 214-665-6724 within **60 calendar days** after you receive this letter. Your response must identify of your intent to, or not to, enter into settlement negotiations with the EPA concerning this matter. Please mail your written response to Mr. Werner at the address that appears in the General Notice.

We look forward to working with you during the coming months.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carl E. Edlund, P.E.", with a flourish at the end.

Carl E. Edlund, P.E.

Director

Superfund Division

Enclosures (4)

ENCLOSURE 1
GENERAL NOTICE REGARDING
CES ENVIRONMENTAL SERVICES, INC.- HOUSTON
HOUSTON, HARRIS COUNTY, TEXAS

This General Notice is from the U.S. Environmental Protection Agency (EPA). This General Notice is directed to you, the Potentially Responsible Party (PRP) of the CES Environmental Services, Inc.- Houston Site (Site). This General Notice does five things:

1. This General Notice tells you that you may be responsible for the presence of hazardous substances found at the Site. When we say "Site" or "property" in this General Notice, we mean the CES Environmental Services, Inc.- Houston Site. The street address for the Site is 4904 Griggs Road, Houston, Harris County, Texas. The street addresses of the contiguous properties that are parts of the Site are 4900 Griggs Road and 5910 Wayland Street. This General Notice is issued under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund).
2. This General Notice provides you with background information leading up to the EPA's investigation of the Site and the EPA's activities to determine the source(s) of the contamination at the Site.
3. This General Notice invites you to meet and enter a settlement with the EPA as a Settling Party regarding the cleanup of this Site and cooperation in conducting the on-going removal action at the Site and for reimbursement of past and future costs.
4. This General Notice advises you that, if you request the EPA to do so, the EPA will consider your ability to pay in determining an appropriate settlement amount.
5. This General Notice provides to you the names of all entities, i.e., PRPs, to which this General Notice will be mailed.

NOTICE THAT YOU MAY BE LIABLE

Under Section 107 of CERCLA, 42 U.S.C. § 9607, responsible parties are those who are current owners or operators of a facility, past owners or operators who owned or operated the facility at the time hazardous substances were released or disposed of at the facility, persons who arranged for disposal or treatment at the facility (usually the person(s) who generated the hazardous substance) or persons who selected that facility and transported the hazardous substances to the facility. Section 107 of CERCLA, 42 U.S.C. § 9607, states that responsible parties are liable to the United States for the costs it has incurred or will incur conducting a response action such as that proposed for the Site. A PRP is therefore responsible for performing the cleanup action in accordance with the EPA requirements, paying for the cleanup by the EPA and reimbursing the Federal Government for past and future costs of the cleanup activities.

BACKGROUND

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. Prior to the bankruptcy, the Site had been owned and operated by CES Environmental Services, Inc. The Site is now under the control of a Trustee for the Estate appointed by the Bankruptcy Court. The Estate does not have the funding necessary to address the conditions at the Site. The Site consists of approximately eleven vacuum boxes, two roll-off boxes, twelve frac tanks, two tanker trailers, twenty aboveground storage tanks, fifteen waste water treatment tanks, waste piles, and numerous totes, vats, drums, and smaller containers. Additionally, there is spillage of

chemicals to exterior surfaces as well as building interiors. The Site has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills have occurred due to vandalism which has resulted in the spillage of chemicals and waste to the ground surface and into an adjacent residential neighborhood. Emergency responses to these spills have involved the Estate, City of Houston, Texas Commission on Environmental Quality (TCEQ) and the EPA. These spill responses were addressed by TCEQ and the EPA.

The information provided by the Estate's consultant shows that there are hazardous wastes along with various hazardous substances within containers located on the Site. The hazardous substances include but are not limited to Benzene (D018), Creosol (D023-026), 2,4,6-Trichlorophenol (D042), pH (D002), Ignitability (D001), MEK (D035), and 1,2-Dichloroethane (D028). These chemicals are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14), and further defined at 40 C.F.R. 302.4.

Response Actions to Date

On or about September 3, 2014, the EPA mobilized its contractors to begin addressing the wastes and spills at the Site. As of December 19, 2014, the EPA Team has addressed the following:

1. Management of stormwater to reduce off-site overflow of contaminated stormwater from the Site.
2. Removal of wastes from ten of twelve vacuum boxes and from two of two roll-off boxes.
3. Removal of wastes from eight of twelve frac tanks. Three frac tanks currently hold wastes.
4. Removal of liquid, i.e., pump able, wastes from eleven of twenty-three aboveground storage tanks (AST). Sludge and residual materials remain until sludge removal and tank cleaning of ASTs is completed.
5. Empty totes/drums have been segregated for temporary storage.
6. Waste piles dumped to the ground from the theft of seven roll-off boxes was removed by the Trustee.
7. Lab chemicals/company process samples were collected and disposed by the Trustee.
8. Process chemicals were collected and disposed by the Trustee.

PARTICIPATION

The EPA is inviting you to enter into a settlement with the EPA. In addition to avoiding the costs of litigation, settling with the EPA provides you with another advantage. Under the Superfund law, settling with the EPA helps protect you should another responsible party sue you for costs which that party pays to the EPA. Also, if you choose not to settle with the EPA, then the EPA may take civil administrative action and, ultimately, the EPA may request civil judicial action. A list of entities receiving this General Notice letter is included as Enclosure 3 to this letter.

OPPORTUNITY TO MEET

The EPA will also provide you the opportunity to meet with the EPA representatives to discuss your desire to enter into a settlement with the EPA.

FINANCIAL CONCERNS/ABILITY TO PAY SETTLEMENTS

The EPA is aware the financial ability of some PRPs to contribute toward the cleanup and/or payment of response costs at a site may be substantially limited. If you believe and can document that you fall within that category, please contact Mr. Robert Werner at 214-665-6724 for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements. If the EPA concludes that you have a legitimate inability to pay the full amount of the EPA's costs, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that because the EPA has a potential claim against you, if your financial status changes in any significant way, i.e., filing for bankruptcy, you must include the EPA as a creditor.

RESOURCES AND INFORMATION FOR SMALL BUSINESSES

On January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at:

<http://www.epa.gov/swerosps/bf/sblbra.htm>

and review the EPA guidance regarding these exemptions at:

<http://www.epa.gov/compliance/resources/policies/cleanup/superfund>

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers, which offer various forms of resources to small businesses. You may inquire about these resources at www.epa.gov.

In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/sbo. Finally, the EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA), which is enclosed with this letter (Enclosure 4).

YOUR RESPONSE TO EPA

Please notify Mr. Werner in writing at the address indicated below *within 60 calendar days after you receive this letter* to indicate your willingness to enter in good faith as a Settling Party. **If the EPA does not receive your written response within 60 calendar days after you receive this letter, the EPA will assume you do not wish be a Settling Party and the EPA will then take whatever actions are necessary to abate the potential threat to human health and the environment posed by contaminants on the property.**

Your response to this letter should be directed to:

Mr. Robert Werner
Enforcement Officer (6SF-TE)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202
Telephone: 214-665-6724, Fax: 214-665-6660
werner.robert@epa.gov

If you or your attorney have legal questions pertaining to this matter, please direct them to:

Ms. Amy Salinas
Assistant Regional Counsel (6RC-S)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202
Telephone: 214-665-8063, Fax: 214-665-6460
salinas.amy@epa.gov

The discussions of fact or law in this General Notice are meant to help you understand CERCLA and the EPA's actions at the Site. The discussions of fact and law are not final positions on any matter discussed in this General Notice.

ENCLOSURE 2
GENERAL NOTICE REGARDING
CES ENVIRONMENTAL SERVICES, INC.- HOUSTON
HOUSTON, HARRIS COUNTY, TEXAS

EVIDENTIARY DOCUMENTATION

SAMPLES OF EVIDENCE

Enclosed are copies of samples of documented evidence that identifies the name of your company. The examples are not intended to represent all the evidence in CES records. It is only a representative sample that identifies:

1. A waste hazardous substance that was generated by your company and was transported to the Site for disposal and/or recycling, or
2. A waste hazardous substance that was generated by your company and that was transported in a CES tanker trailer to a facility other than the Site for disposal and/or recycling. The EPA believes that residue of the waste hazardous substance that had been transported in the CES tanker trailer was released at the Site when the interior of the CES tanker trailer was cleaned at the Site.

		FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U.S: 703-527-3887 Washington, DC Collect		STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE <small>Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.</small>	
From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397		Route: CES ENVIRONMENTAL SERVICES INC		Ship Date: July 30 , 2008	Page 1 Of 1
Charges are to be: Prepaid		Car/Container #: CES 235 Seal Numbers:		Delivery Date: July 30 , 2008	
Send Freight bill to: Lubrizol C/O Ryder Transportation Management 39550 13 Mile Road Suite 101 Novi, MI 48377		Delivery number: 81053923 Order Number: Customer Reference No.: Booking Number: Steamship Line: Vessel: Cut off Date:		Pier Address:	
Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 USA				Consignee:	
<small>The property described below, in apparent good order, except as noted (contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG CODE.</small>					
Quantity/ Unit	HM	Description of Materials. Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)	
46,080 46,080		LIQUID CAUSTIC SOLUTION *****Totals***** ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID, N.O.S., (SODIUM HYDROXIDE), 9, UN3082, PG III, RQ, (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONSE INFORM ATION. DRIVER'S INITIALS <i>MM</i>		0 0	
Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.					
<small>The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents.</small>					
<small>Where the rates on any of the items listed above are dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.</small>		<small>(Shippers imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Classification.</small> <small>Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and other lawful charges.</small> Signature: RON BEESON (Signature of Consignor)			
I Hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.		Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED Name of Carrier: CES ENVIRONMENTAL SERVICES INC PRO Number: Per: <i>[Signature]</i> (Signature - Not Initials)			
Shipper: The Lubrizol Corporation (U.S.) Prepared On: July 30 , 2008 Per: RON BEESON					

 From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397		FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U.S: 703-527-3887 Washington, DC Collect		STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE <small>Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.</small>	
Charges are to be: Prepaid		Route: CES ENVIRONMENTAL SERVICES INC		Ship Date: July 30 , 2008 Page 1 Of 1	
Send Freight bill to: Lubrizol C/O Ryder Transportation Management 39550 13 Mile Road Suite 101 Novi, MI 48377		Car/Container #: CES 235 Seal Numbers:		Delivery Date: July 30 , 2008 Delivery number: 81053920 Order Number: Customer Reference No.: Booking Number: Steamship Line: Vessel: Cut off Date:	
Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 USA				Pier Address:	
<small>The property described below, in apparent good order, except as noted (contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG CODE</small>					
Quantity/ Unit	HM	Description of Materials, Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)	
46,380		LIQUID CAUSTIC SOLUTION		0	
46,380		****Totals****		0	
		ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID, N.O.S., (SODIUM HYDROXIDE) 9 UN3082 PG III, RQ (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONSE INFORM ATION. DRIVER'S INITIALS <i>AH</i>			
Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.					
<small>The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents.</small>					
<small>Where the rates on any of the items listed above are dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.</small>		<small>(Shippers imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Classification.</small> <small>Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and other lawful charges.</small> Signature: RON BEESON (Signature of Consignor)			
<small>I Hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.</small>		Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED Name of Carrier: CES ENVIRONMENTAL SERVICES INC PRO Number: Per: <i>AH</i> (Signature - Not Initials)			
Shipper: The Lubrizol Corporation (U.S.) Prepared On: July 30 , 2008 Per: RON BEESON					

EPAHO077002249

 From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397		FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U.S: 703-527-3887 Washington, DC Collect		STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.	
Charges are to be: Prepaid		Route: CES ENVIRONMENTAL SERVICES INC		Ship Date: July 09 , 2008	Page 1 Of 1
Send Freight bill to: Lubrizol C/O Ryder Transportation Management 39550 13 Mile Road Suite 101 Novi, MI 48377		Car/Container #: CES-243 Seal Numbers:		Delivery Date: July 12 , 2008 Delivery number: 81040874 Order Number: Customer Reference No.: Booking Number: Steamship Line: Vessel: Cut off Date:	
Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 USA				Pier Address:	
The property described below, in apparent good order, except as noted (contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG CODE.					
Quantity/ Unit	HM	Description of Materials. Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)	
43,160		LIQUID CAUSTIC SOLUTION		0	
43,160		*****Totals***** ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID N.O.S. (SODIUM HYDROXIDE) 9 UN3082 PG II, RQ (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONSE INFORMATION. DRIVER'S INITIALS <u>BS</u>		0	
Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.					
The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents.					
Where the rates on any of the items listed above are dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.		(Shippers imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Classification.			
		Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and other lawful charges.			
		Signature: RON BEESON (Signature of Consignor)			
I Hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.		Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED			
Shipper: The Lubrizol Corporation (U.S.) Prepared On: July 09 , 2008 Per: RON BEESON		Name of Carrier: CES ENVIRONMENTAL SERVICES INC PRO Number: 67715 Per: Brent Satby (Signature - Not Initials)			

EPAHO077002439

Lubrizol		FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U.S: 703-527-3887 Washington, DC Collect		STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.	
From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397		Route: CES ENVIRONMENTAL SERVICES INC		Ship Date: September 05, 2008 Page 1 Of 1	
Charges are to be: Prepaid		Car/Container #: 235 CES Seal Numbers:		Delivery Date: September 02, 2008	
Send Freight bill to: Lubrizol C/O Ryder Transportation Management 39550 13 Mile Road Suite 101 Novi, MI 48377				Delivery number: 81077777 Order Number: Customer Reference No.: Booking Number: Steamship Line: Vessel: Cut off Date:	
Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 USA			Pier Address:		
The property described below, in apparent good order, except as noted (contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG CODE.					
Quantity/ Unit	HM	Description of Materials. Special Marks, and Instructions		Flash Point(°C)	Weight(lbs.)
44,220 44,220		LIQUID CAUSTIC SOLUTION *****Totals***** ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID.N.O.S. (SODIUM HYDROXIDE), 9 UN3082, PG III, RQ, (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONSE INFORMATION. DRIVER'S INITIALS <i>PI</i>			0 0
Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.					
The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents.					
Where the rates on any of the items listed above are dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.		(Shippers imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Classification.		Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and other lawful charges. Signature: RON BEESON (Signature of Consignor)	
I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.		Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED			
Shipper: The Lubrizol Corporation (U.S.) Prepared On: September 05, 2008 Per: RON BEESON		Name of Carrier: CES ENVIRONMENTAL SERVICES INC PRO Number: Per: <i>Peter Semionov</i> (Signature - Not Initials)			

EPAHQ077002722

		FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U.S: 703-527-3887 Washington, DC Collect		STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.	
From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397		Route: CES ENVIRONMENTAL SERVICES INC		Ship Date: September 29 , 2008	Page 1 Of 1
Charges are to be: Prepaid		Car/Container #: CES-L6731 Seal Numbers:		Delivery Date: September 29 , 2008	
Send Freight bill to: Lubrizol C/O Ryder Transportation Management 39550 13 Mile Road Suite 101 Novi, MI 48377		Delivery number: 81093529 Order Number: Customer Reference No.: Booking Number: Steamship Line: Vessel: Cut off Date:			
Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 USA				Pier Address:	
The property described below, in apparent good order, except as noted (contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG CODE.					
Quantity/ Unit	HM	Description of Materials. Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)	
47,440		LIQUID CAUSTIC SOLUTION *****Totals***** ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID N.O.S. (SODIUM HYDROXIDE) 9 UN3082 PG III, RQ, (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONSE INFORMATION. DRIVER'S INITIALS <u>RS</u>		0	
47,440				0	
Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.					
The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents.					
Where the rates on any of the items listed above are dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.		(Shippers imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Classification.		Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and other lawful charges. Signature: RON BEESON (Signature of Consignor)	
I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.		Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED Name of Carrier: CES ENVIRONMENTAL SERVICES INC PRO Number: 72735 Per: <u>[Signature]</u> (Signature - Not Initials)			
Shipper: The Lubrizol Corporation (U.S.) Prepared On: September 29 , 2008 Per: RON BEESON					

EPAHO077002824

		FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U.S: 703-527-3887 Washington, DC Collect		STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE <small>Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.</small>	
From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397		Route: CES ENVIRONMENTAL SERVICES INC		Ship Date: June 23 , 2008 Page 1 Of 1	
Charges are to be: Prepaid		Car/Container #: 235 CES Seal Numbers:		Delivery Date: June 02 , 2008 Delivery number: 81017935 Order Number: Customer Reference No.: Booking Number: Steamship Line: Vessel: Cut off Date:	
Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 USA				Pier Address:	
The property described below, in apparent good order, except as noted (contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG CODE					
Quantity/ Unit	HM	Description of Materials. Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)	
46,780		LIQUID CAUSTIC SOLUTION		0	
46,780		****Totals**** ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID N.O.S. (SODIUM HYDROXIDE) 9 UN3082 PG III, RQ, (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONSE INFORMATION. DRIVER'S INITIALS: <u>AT</u>		0	
Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.					
The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents.					
Where the rates on any of the items listed above are dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.		(Shippers imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Classification.			
I Hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.		Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and other lawful charges. Signature: RON BEESON (Signature of Consignor)			
Shipper: The Lubrizol Corporation (U.S.) Prepared On: June 23 , 2008 Per: RON BEESON		Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED Name of Carrier: CES ENVIRONMENTAL SERVICES INC PRO Number: Per: (Signature - Not Initials)			

EPAHO077000649

CES Environmental Services

Container / Tank Cleaning Division
 4904 Griggs Rd. • Houston, TX 77021
 Phone: (713) 676-1460 • Fax: (713) 676-1676

TANK WASH WORK ORDER**23085**

PO # 73878	Customer: CES	Date: 10-15-08
Tractor	Address:	Time: 5pm
Trailer / Container Number L6731	Dropped By: D. Raymond	Need By:

CONTAINER TYPE: ☐ TOTE BIN ☐ ROLL DOOR BOX ☐ ISO CONTAINER ☐ DRY BULK
☒ TANK TRAILER ☐ ROLL TARP BOX ☐ VACUUM BOX ☐ FRAC TANK ☐ POLY TANK ☐ VACUUM TRUCK

Compartment #	Last Contained	Heel - Hazardous	Heel - Non-Haz	Drum / Rolloff
1	Black Oil / Sodium Aluminate			
2				
3				
4				
5				

CLEANING CODES	WORK PERFORMED	TANK ENTRY PERMIT
1 Air Dry		Oxygen (19.5% -23.5%) #1 21.0 #2 21.0 #3 21.0 #4 21.0 #5 21.0
2 Quick Rinse		LEL (<10%) #1 0 #2 0 #3 0 #4 0 #5 0
3 Cold Water Rinse		CO ₂ (<35 ppm) #1 0 #2 0 #3 0 #4 0 #5 0
4 Hot Water Rinse		Toxic Vapor #1 0 #2 0 #3 0 #4 0 #5 0
5 Steam Only (Per Hour)		Signature: JC
6 Steam & Dry		Stripper Usage:
7 Rinse, Steam & Dry		Comments:
8 Detergent Wash, Rinse & Dry	/	Lubrizol Baysport
9 Caustic Wash & Dry		Liquid Caustic
10 Caustic Wash, Rinse & Dry	/	Sodium Aluminate
11 Waste Water Surcharge		
12 Solvent Wash (Diesel # Hours)		
13 Solvent Wash (Stripper)		
14 Exterior Tractor Wash		
15 Exterior Trailer Wash (w/o Internal)		
16 Exterior Trailer Wash (with Internal)		
17 Exterior Acid Brite Wash		Authorized Additional Services:
18 Hand Labor (# Men / # Hours)		
19 Hydroblaster (# Hours)		
20 Solvent Wash (Green Stripper)		
21 Passivation		
Hose Cleaning		
Pump Cleaning		

Cleaned By: **JC** Date **10-15-08**

Inspected By: _____ Date _____

Print Name: _____ Date _____

Signature: _____

CES Environmental Services, Inc., Cleaning Division, makes no guarantees with respect to the thoroughness of the tank washing procedure or the total elimination of interior residues and/or moisture. Final inspection of the equipment remains the responsibility of the customer, and they hereby release CES Environmental Services, Inc., Cleaning Division, from any responsibility for claims arising from any allegations that the equipment was improperly cleaned, resulting in damage or loss.

CES Environmental Services, Inc., Cleaning Division, is in no manner responsible for any damages or losses of equipment and/or materials left in their yard.

EPAHO077002633

		FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U.S: 703-527-3887 Washington, DC Collect		STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.	
From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397		Route: CES ENVIRONMENTAL SERVICES INC		Ship Date: October 17, 2008 Page 1 Of 1 Delivery Date: October 17, 2008	
Charges are to be: Prepaid		Car/Container #: CES-L6731 Seal Numbers:		Delivery number: 81099725 Order Number: Customer Reference No.: Booking Number: Steamship Line: Vessel: Cut off Date:	
Send Freight bill to: Lubrizol C/O Ryder Transportation Management 39550 13 Mile Road Suite 101 Novi, MI 48377				Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 USA	
Pier Address:				The property described below, in apparent good order, except as noted (contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG CODE.	
Quantity/ Unit	HM	Description of Materials, Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)	
46,840		LIQUID CAUSTIC SOLUTION		0	
46,840		****Totals****		0	
		ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID N.O.S. (SODIUM HYDROXIDE) 9 UN3082 PG III RQ (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONSE INFORMATION. DRIVER'S INITIALS <i>12</i>			
Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.					
The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents.					
Where the rates on any of the items listed above are dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.		(Shippers imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Classification.		Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and other lawful charges. Signature: RON BEESON (Signature of Consignor)	
I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.		Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED Name of Carrier: CES ENVIRONMENTAL SERVICES INC PRO Number: <i>33879</i> Per: <i>Ron Beeson</i> (Signature - Not Initials)			
Shipper: The Lubrizol Corporation (U.S.) Prepared On: October 17, 2008 Per: RON BEESON					



**CES Environmental
Services, Inc.**

4904 Griggs Road
Houston, TX 77021
Phone: (713) 676-1460
Fax: (713) 676-1676

Invoice

Date	Invoice #
9/29/2008	50051

Bill To: The Lubrizol Corporation
Attn: Jan McClain
12801 Bay Area Blvd.
Pasadena, TX 77507-1324

COPY

		P.O. No.	Terms	Project	
		4500955487	Net 30		
Quantity	Description	Manifest #	Rate	Amount	
1	Transportation services by CES on 9/2/08	81077774	450.00	450.00	
1	Transportation services by CES on 9/2/08	81068296	450.00	450.00	
1	Transportation services by CES on 9/4/08	81077775	450.00	450.00	
0.25	Demurrage @ \$69.00 per hour		69.00	17.25	
1	Transportation services by CES on 9/4/08	81077776	450.00	450.00	
0.25	Demurrage @ \$69.00 per hour		69.00	17.25	
1	Transportation services by CES on 9/5/08	81077778	450.00	450.00	
1	Transportation services by CES on 9/5/08	81077777	450.00	450.00	
0.25	Demurrage @ \$69.00 per hour		69.00	17.25	
1	Transportation services by CES on 9/6/08	81077779	450.00	450.00	
0.25	Demurrage @ \$69.00 per hour		69.00	17.25	
1	Transportation services by CES on 9/6/08	81079276	450.00	450.00	
1	Transportation services by CES on 9/8/08	81079279	450.00	450.00	
We appreciate your business!		Subtotal			
Late Payment Policy: Any unpaid balances beginning on the 30th day after the account is due will accrue a per annum interest rate of 7.5%, unless otherwise stated in a formalized contract.		Sales Tax (8.25%)			
		Total			



From: The Lubrizol Corporation
At: 12801 BAY AREA BLVD
PASADENA, TX 77507-1397

FOR CHEMICAL EMERGENCY
Spill, Leak, Fire, Exposure or Accident
Call CHEMTREC
1-800-424-9300
Day or Night
For call originating outside of the U.S:
703-527-3887 Washington, DC Collect

STRAIGHT BILL OF LADING
SHORT FORM
ORIGINAL - NOT NEGOTIABLE

Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.

Charges are to be: Prepaid

Send Freight bill to:
Lubrizol
C/O Ryder Transportation
Management
39550 13 Mile Road
Suite 101
Novi, MI 48377

Route: CES ENVIRONMENTAL
SERVICES INC

Car/Container #: CES-235
Seal Numbers:

Ship Date: September 02, 2008

Page 1 Of 1

Delivery Date: August 31, 2008

Delivery number: 81077774

Order Number:

Customer Reference No.:

Booking Number:

Steamship Line:

Vessel:

Cut off Date:

Consigned to:
GULF COAST WASTE DISPOSAL AUTHORITY
WASHBURN TUNNEL FACILITY
1002 N. RICHEY STREET
PASADENA TX 77506
USA

Pier Address:

The property described below, in apparent good order, except as noted (contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG CODE.

Quantity/ Unit	HM	Description of Materials. Special Marks, and Instructions	Flash Point (°C)	Weight (lbs.)
44,740		LIQUID CAUSTIC SOLUTION		0
44,740		****Totals****		0
		ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID, N.O.S., (SODIUM HYDROXIDE), 9, UN3082, PG III, RQ, (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONSE INFORM ATION. DRIVER'S INITIALS <i>RS</i>		

Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.

The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents.

Where the rates on any of the items listed above are dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.

(Shippers imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Classification.

Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and other lawful charges.

Signature: RON BEESON

(Signature of Consignor)

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED

Name of Carrier: CES ENVIRONMENTAL SERVICES INC

PRO Number: 71298

Shipper: The Lubrizol Corporation (U.S.)
Prepared On: September 02, 2008
Per: RON BEESON

Per: *[Signature]*

(Signature - Not Initials)

138383

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TXD000642348	2. Page 1 of 1	3. Emergency Response Phone 281 479-2851	4. Manifest Tracking Number 000377862GBF
5. Generator's Name and Mailing Address The Lubrizol Corporation 12801 Bay Area Blvd. (ATTN: Frank Hejtmanek) Pasadena, TX 77507-1397 Generator's Phone: 281 479-2851 ext. 7590 (24 HR. EMERGENCY CONTACT)			Generator's Site Address (if different than mailing address) TCEQ SW Ident: 30325		
6. Transporter 1 Company Name Beal Service Co Inc			U.S. EPA ID Number TX198089859		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address SYSTECH ENVIRONMENTAL CORPORATION 1420 SOUTH CEMENT ROAD FREDONIA, KS 66736 Facility's Phone: (800) 778-7224			U.S. EPA ID Number TCEQ SW Ident: D0020 KS0980633259		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity
			No.	Type	12. Unit WL/Vol.
		1. RQ, WASTE FLAMMABLE LIQUID, N.O.S., 3, UN1993, PGII, (XYLENE, TOLUENE)	1	TT	40160 P
		2.			
		3.			
		4.			
13. Waste Codes 0021-206-H 0001					
14. Special Handling Instructions and Additional Information SYSTECH #CG142346 R061 CLASS 3 PLACARDS REQUIRED. LDR REQUIRED. USE PROTECTIVE EQUIPMENT WHEN HANDLING THIS WASTE.					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Officer's Printed/Typed Name: Gloria Bennett Signature: Gloria Bennett Month: 06 Day: 10 Year: 09					
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____				
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: Mark Wallact Signature: Mark Wallact Month: 06 Day: 10 Year: 09 Transporter 2 Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____				
TRANSPORTER	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
	Manifest Reference Number: _____				
	18b. Alternate Facility (or Generator) U.S. EPA ID Number: _____				
	Facility's Phone: _____				
DESIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator) _____ Month: _____ Day: _____ Year: _____				
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)				
	1. H001 2. 3. 4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name: Bruce Hawley Signature: Bruce Hawley Month: 06 Day: 11 Year: 09					

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

EPAHQ118002001

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

P.O. Box 13087

Austin, Texas 78711-3087



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Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TXD000642348		Manifest Document No. 53771	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address The Lubrizol Corporation 12801 Bay Area Blvd. (ATTN: Frank Hejtmanek) Pasadena, TX 77507-1397					A. State Manifest Document Number 3775371		
4. Generator's Phone (281 479-2851 ext. 7590 (24 HR. EMERGENCY CONTACT))					B. State Generator's ID 30325		
5. Transporter 1 Company Name CES ENVIRONMENTAL SERVICES, INC.		6. US EPA ID Number TXD0008950461		C. State Transporter's ID 30900		D. Transporter's Phone (713) 676-1460	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Vopak Industrial Services USA Inc. 2759 BATTLEGROUND ROAD DEER PARK, TEXAS 77536		10. US EPA ID Number TXD097673149		G. State Facility's ID 30567		H. Facility's Phone (281) 604-6150	
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
X	a. RO, WASTE FLAMMABLE LIQUID, N.O.S., 3, UN1993, PGII, (XYLENE, TOLUENE)		1		TT	30325	P D001 0021-206-H
	b.						
	c.						
	d.						
J. Additional Descriptions for Materials Listed Above 11a EM-1278-0002 ERG# 128 TNRCC CODE = 0021-206-H. TANK U0614R, PO#4500260992					K. Handling Codes for Wastes Listed Above H061		
15. Special Handling Instructions and Additional Information CLASS 3 PLACARDS REQUIRED. LDR REQUIRED. USE PROTECTIVE EQUIPMENT WHEN HANDLING THIS WASTE.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
TRANSPORTER	Printed/Typed Name S/P DAN EDISON		Signature S/P Dan Edison		Month Day Year 4 28 06		
	17. Transporter 1 Acknowledgement of Receipt of Materials				Date		
	Printed/Typed Name Brent Sittig		Signature Brent Sittig		Month Day Year 4 28 06		
FACILITY	18. Transporter 2 Acknowledgement of Receipt of Materials				Date		
	Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name L. Sec Tawegui		Signature L. Sec Tawegui		Month Day Year 4 28 06			

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY
P.O. Box 13087
Austin, Texas 78711-3087



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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TXD00064234850083	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address The Lubrizol Corporation 12801 Bay Area Blvd. (ATTN: Frank Heitmanek) Pasadena, TX 77507-1397				A. State Manifest Document Number 3450083		
4. Generator's Phone (281) 479-2851 ext. 7590 (24 HR. EMERGENCY CONTACT)				B. State Generator's ID 30325		
5. Transporter 1 Company Name CES ENVIRONMENTAL SERVICES, INC.				C. State Transporter's ID 30900		
6. US EPA ID Number TXD0008950461				D. Transporter's Phone (713) 474-1440		
7. Transporter 2 Company Name				E. State Transporter's ID		
8. US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address Vppak Industrial Services USA Inc. 2759 BATTLEGROUND ROAD DEER PARK, TEXAS 77536				G. State Facility's ID 30547		
10. US EPA ID Number TXD0097673149				H. Facility's Phone (281) 604-6150		
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
	FL, WASTE FLAMMABLE LIQUID, N.O.S., 3, UN1993, PGII, (XYLENE, TOLUENE)	1	DM		P	D001 0021-206-H
	b.					
	c.					
	d.					
J. Additional Descriptions for Materials Listed Above 11a. EM-127B-0002 ERGH 128 INRC CODE = 0021-206-H. TANK 00614R. PU#4500260992				K. Handling Codes for Wastes Listed Above M061		
15. Special Handling Instructions and Additional Information CLASS 3 PLACARDS REQUIRED. LDR REQUIRED. USE PROTECTIVE EQUIPMENT WHEN HANDLING THIS WASTE.				REFERENCE ORIGINAL MANIFEST # 345007679		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name		Signature		Month Day Year		
17. Transporter 1 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name		Signature		Month Day Year		
18. Transporter 2 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space NOT ALL WASTE WAS REMOVED FROM TANK. TANK SENT TO CES ENV. SVCS FOR NEEL REMOVAL (TCEQ I.D.# 30900)						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Date Month Day Year		

White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

EPAHO118002299



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Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TXD000642348	Manifest Document No. 50079	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address The Lubrizol Corporation 12801 Bay Area Blvd. (Attn: Frank Heitmanek) Pasadena, TX 77507-1397				A. State Manifest Document Number 3450079		
4. Generator's Phone (281) 479-2851 ext. 7590 (24 HR. EMERGENCY CONTACT)				B. State Generator's ID 30325		
5. Transporter 1 Company Name BEALINE SERVICES INC.		6. US EPA ID Number TXD980809859		C. State Transporter's ID 40421		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (281) 474-7772		
9. Designated Facility Name and Site Address Vopak Industrial Services USA Inc. 2759 BATTLEGROUND ROAD DEER PARK, TEXAS 77536				E. State Transporter's ID		
10. US EPA ID Number TXD097673149				F. Transporter's Phone		
				G. State Facility's ID 30367		
				H. Facility's Phone (281) 604-6150		
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.	
	a. WASTE FLAMMABLE LIQUID, N.O.S., 3, UN1993, PGII, (XYLENE, TOLUENE)	1	34460	P	D001 0021-206-H	
	b.					
	c.					
	d.					
J. Additional Descriptions for Materials Listed Above 11a EM-1278-0002 ERSH 12B INREC CODE = 0021-206-H TANK 00614R, POH4500260992 <i>Total Pounds 28000</i>				K. Handling Codes for Wastes Listed Above M061		
15. Special Handling Instructions and Additional Information CLASS 3 PLACARDS REQUIRED. LDR REQUIRED. USE PROTECTIVE EQUIPMENT WHEN HANDLING THIS WASTE.						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name <i>Gloria Bennett</i>		Signature <i>Gloria Bennett</i>		Month Day Year 09/08/04		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>E. Johnson</i>		Date 09/09/04		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space <i>Referring 6,460 pounds Back to generator 0900 9-9-04</i>						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name <i>JASON SOWS</i>		Signature <i>JASON SOWS</i>		Date 09/19/04		

ENCLOSURE 3
GENERAL NOTICE LETTER REGARDING
CES ENVIRONMENTAL SERVICES, INC.- HOUSTON
HOUSTON, HARRIS COUNTY, TEXAS

ENTITIES TO WHICH THIS GENERAL NOTICE WILL BE MAILED

The Lubrizol Corporation
Advanced Aromatics, L.P
AMTEX Machine Products, Inc.
Andergauge Drilling Systems
Arkema Inc.
Ball Corporation
Canrig Drilling Technology Ltd.
Century Asphalt (Humble) d/b/a for Baytown Asphalt Materials, Ltd.
Champion Technologies (Merged into Nalco Company)
Citgo Petroleum Corporation (Citgo Refinery)
Cross Oil & Refining & Marketing, Inc..
Dover Corporation - Cook Compression (C Lee Cook)
Evalca Company of America
KMCO, Inc. (new name is Ramsey Properties, L.P.)
PGI International, LTD (merged into Parker-Hannifin Corporation)
Philip Reclamation Services Houston , LLC
Plaquemine Point Shipyard, Sunshine, LA
PPG Industries, Inc.
Praxair, Inc.
Proler Southwest
Quest Chemical Corporation
RasGas in Qatar @ KMTEX
Sierra Chemical Corporation
Skyhawk Chemicals, Inc.
Smithfield BioEnergy, LLC
Sun Coast Resources , Inc.
T. T. Barge Mile (Barge Mile 183, 237)
T. T. Barge Cleaning Mile 183, Inc. (d/b/a T.T. Barge [Mile 183])
T. T. Barges Services Mile 237 LLC (d/b/a T T Barge Mile [Barge Mile 237])
T.T. Barge (Mile 237)
T3 Energy Services-Cypress
Taber Extrusions
Targa Midstream Services LP
Tenaris Coiled Tube, LLC (Beitway 8) a-k-a Precision Tube
Texas Oil Tools, NOV (Conroe)

Texas Water Management

Total Petrochemicals, Inc. - Port Arthur

Transmontaing Product Service

Valero Refining-Texas, L.P. (d/b/a Valero Refining Co of Texas)

ZaCh System Corporation (Ampac)

ENCLOSURE 4
GENERAL NOTICE LETTER REGARDING
CES ENVIRONMENTAL SERVICES, INC.- HOUSTON
HOUSTON, HARRIS COUNTY, TEXAS

SMALL BUSINESS RESOURCES FACT SHEET



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines, websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Compliance Assistance Centers

(www.assistancecenters.net)

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

Agriculture

(www.epa.gov/agriculture or 1-888-663-2155)

Automotive Recycling Industry

(www.ecarcenter.org)

Automotive Service and Repair

(www.ccar-greenlink.org or 1-888-GRN-LINK)

Chemical Industry

(www.chemalliance.org)

Construction Industry

(www.cicacenter.org or 1-734-995-4911)

Education

(www.campuserc.org)

Healthcare Industry

(www.hercenter.org or 1-734-995-4911)

Metal Finishing

(www.nmfrc.org or 1-734-995-4911)

Paints and Coatings

(www.paintcenter.org or 1-734-995-4911)

Printed Wiring Board Manufacturing

(www.pwborc.org or 1-734-995-4911)

Printing

(www.pneac.org or 1-888-USPNEAC)

Transportation Industry

(www.transource.org)

Tribal Governments and Indian Country

(www.epa.gov/tribal/compliance or 202-564-2516)

US Border Environmental Issues

(www.bordercenter.org or 1-734-995-4911)

The Centers also provide State Resource Locators

(www.envcap.org/statetools/index.cfm) for a wide range of topics to help you find important environmental compliance information specific to your state.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page

www.epa.gov

Small Business Gateway

www.epa.gov/smallbusiness

Compliance Assistance Home Page

www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance

www.epa.gov/compliance

Voluntary Partnership Programs

www.epa.gov/partners



U.S. EPA SMALL BUSINESS RESOURCES

Hotlines, Helplines & Clearinghouses

(www.epa.gov/epahome/hotline.htm)

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. A few examples are listed below:

Clean Air Technology Center

(www.epa.gov/ttn/catc or 1-919-541-0800)

Emergency Planning and Community Right-To-Know Act

(www.epa.gov/superfund/resources/infocenter/epcra.htm or 1-800-424-9346)

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information.

(www.epa.gov/sbo or 1-800-368-5888)

The National Environmental Compliance Assistance

Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers.
(www.epa.gov/clearinghouse)

National Response Center to report oil and hazardous substance spills.

(www.nrc.uscg.mil or 1-800-424-8802)

Pollution Prevention Information Clearinghouse

(www.epa.gov/opptintr/ppic or 1-202-566-0799)

Safe Drinking Water Hotline

(www.epa.gov/safewater/hotline/index.html or 1-800-426-4791)

Stratospheric Ozone Refrigerants Information

(www.epa.gov/ozone or 1-800-296-1996)

Toxics Assistance Information Service also includes asbestos inquiries.

(1-202-554-1404)

Wetlands Helpline

(www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or the following two resources:

EPA's Small Business Ombudsman

(www.epa.gov/sbo or 1-800-368-5888)

Small Business Environmental Homepage

(www.smallbiz-enviroweb.org or 1-724-452-4722)

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated,

businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses:

The Small Business Compliance Policy

(www.epa.gov/compliance/incentives/smallbusiness)

Audit Policy

(www.epa.gov/compliance/incentives/auditing)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an SBA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees, or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.